



1 IT IS HEREBY STIPULATED by and between the parties through their undersigned counsel,  
2 subject to the approval of the Court, that Plaintiff Latrina C. Cox be awarded attorney fees and  
3 expenses in the amount of eight thousand four hundred dollars (\$8,400.00) under the Equal Access to  
4 Justice Act (EAJA), 28 U.S.C. § 2412(d). This amount represents compensation for all legal services  
5 rendered on behalf of Plaintiff by counsel in connection with this civil action, in accordance with 28  
6 U.S.C. §§ 1920; 2412(d).

7 After the Court issues an order for EAJA fees to Plaintiff, the government will consider the  
8 matter of Plaintiff's assignment of EAJA fees to Olinsky Law Group. Pursuant to *Astrue v. Ratliff*,  
9 560 U.S. 586, 598, 130 S.Ct. 2521, 177 L.Ed.2d 91 (2010), the ability to honor the assignment will  
10 depend on whether the fees are subject to any offset allowed under the United States Department of  
11 the Treasury's Offset Program. After the order for EAJA fees is entered, the government will  
12 determine whether they are subject to any offset.

13 Fees shall be made payable to Plaintiff, but if the Department of the Treasury determines that  
14 Plaintiff does not owe a federal debt, then the government shall cause the payment of fees, expenses  
15 and costs to be made directly to Olinsky Law Group, pursuant to the assignment executed by Plaintiff.  
16 Any payments made shall be delivered to Olinsky Law Group.

17 This stipulation constitutes a compromise settlement of Plaintiff's request for EAJA attorney  
18 fees, and does not constitute an admission of liability on the part of Defendant under the EAJA or  
19 otherwise. Payment of the agreed amount shall constitute a complete release from, and bar to, any and  
20 all claims that Plaintiff and/or Olinsky Law Group may have relating to EAJA attorney fees in  
21 connection with this action.

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1 This award is without prejudice to the rights of Olinsky Law Group, to seek Social Security  
2 Act attorney fees under 42 U.S.C. § 406(b), subject to the savings clause provisions of the EAJA.

3  
4 Dated: September 28, 2022

Respectfully submitted,

5 OF COUNSEL, OLINSKY LAW GROUP

6 /s/ Hal Taylor  
7 HAL TAYLOR  
Attorney for Plaintiff

8 (\*as authorized via email on September 28, 2022)  
9 Attorney for Plaintiff

10 Dated: September 28, 2022

Respectfully submitted,

11 JASON M. FRIERSON  
12 United States Attorney

13 /s/ Sathya Oum  
14 SATHYA OUM  
15 Special Assistant United States Attorney  
16 Attorneys for Defendant  
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18 **ORDER**

19 IT IS ORDERED that ECF No. 34 is GRANTED.

20 IT IS FURTHER ORDERED that ECF No. 33 is DENIED as moot.

21 E IT IS SO ORDERED

22 DATED: 11:21 am, September 30, 2022

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24 BRENDA WEKSLER  
25 UNITED STATES MAGISTRATE JUDGE  
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**CERTIFICATE OF SERVICE**

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **STIPULATION FOR THE AWARD AND PAYMENT OF ATTORNEY FEES AND EXPENSES PURSUANT TO THE EQUAL ACCESS TO JUSTICE ACT, 28 U.S.C. § 2412(d), AND COSTS PURSUANT TO 28 U.S.C. § 1920** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Hal Taylor, Esq.  
Of Counsel, Olinsky Law Group  
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2551 West Lakeridge Shores  
Reno, NV 89519  
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Facsimile: 775-329-1113  
Email: [haltaylorlawyer@gbis.com](mailto:haltaylorlawyer@gbis.com)

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 28, 2022

/s/ Sathya Oum  
SATHYA OUM  
Special Assistant United States Attorney